

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(NORTHERN DIVISION)**

ANTWERPEN CHEVROLET, LTD., et al.,	*	
Plaintiffs	*	Civil Action No. CCB02CV1271
vs.	*	
RESOLUTION PROVIDERS, INC., et al.,	*	
Defendants	*	
* *	*	* *

MOTION TO COMPEL DEFENDANTS
CAROL SCOTT STEVENS AND MARK L. MCDONALD
TO APPEAR AT DEPOSITION AND MOTION FOR DEFAULT JUDGMENT
AS A SANCTION IF DEFENDANTS FAIL TO COMPLY

Plaintiffs, Antwerpen Chevrolet, Ltd., Antwerpen Dodge, Ltd., Antwerpen Motorcars, Ltd., and J.A. Motorcars, Inc., all d/b/a Antwerpen Automotive Group (“Antwerpen”), and Argo Insurance Company (“Argo”) hereby move to compel Defendants Carol Scott Stevens (“Stevens”) and Mark L. McDonald (“McDonald”) to appear at a deposition, and for default judgment as a sanction if defendants fail to comply, for the reasons set forth in the Memorandum in Support of Motion to Compel Defendants Carol Scott Stevens and Mark L. McDonald to Appear at Deposition and Motion for Default Judgment as a Sanction if Defendants Fail to Comply, filed contemporaneously with this Motion.

WHEREFORE, it is requested that these Motions be granted, and that sanctions be awarded in favor of Antwerpen and Argo and against Defendants Carol Scott Stevens and Mark L. McDonald for their bad faith failures to appear at the noticed depositions.

April 8, 2003

Respectfully submitted,

PRICE O. GIELEN
Trial Bar No. 00577
Neuberger, Quinn, Gielen,
Rubin & Gibber, P.A.
27th Floor, Commerce Place
One South Street
Baltimore, Maryland 21202
(410) 332-8523
Attorneys for Plaintiffs